

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CONOPCO, INC. D/B/A UNILEVER,

Plaintiff,

v.

WELLS ENTERPRISES, INC.,

Defendant.

Case No.: 1:14-cv-02223-NRB-RLE

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 07/20/2015

WELLS ENTERPRISES, INC.,

Counterclaim Plaintiff,

v.

CONOPCO, INC. D/B/A UNILEVER,

Counterclaim Defendant.

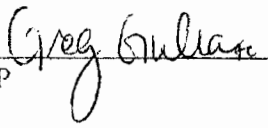
STIPULATION TO EXTEND TIME

Plaintiff-Counterclaim Defendant Conopco, Inc. d/b/a Unilever ("Unilever"), and Defendant-Counterclaim Plaintiff Wells Enterprises, Inc. ("Defendant") (hereinafter collectively, the "Parties"), stipulate and agree that all deadlines set forth in the Court's June 9, 2015 order (the "Order") shall be extended by 30 days, as follows:

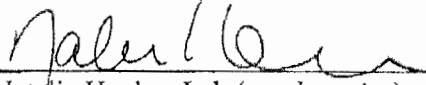
Event	Current Deadline	Proposed Deadline
Initial expert reports due	July 20, 2015	August 20, 2015
Rebuttal expert reports due	August 24, 2015	September 24, 2015
Close of all fact discovery	September 28, 2015	October 28, 2015

Event	Current Deadline	Proposed Deadline
Close of all expert discovery	October 15, 2015	November 16, 2015
Last day to file case dispositive motions	October 29, 2015	November 30, 2015

This stipulation is the parties' second request to extend the deadlines set forth in the case. Your Honor granted the parties' previous request to extend the case deadlines. The requested extension is not being sought for the purpose of delay, but so that the parties can finalize the terms in their settlement agreement. Specifically, while the parties have exchanged draft versions of a proposed settlement agreement, the parties require additional time to finalize a few of the terms in the agreement. Accordingly, the parties, by and through their attorneys of record, hereby stipulate and request that the aforementioned dates set forth in the Court's June 9, 2015 order be continued as set forth above. The Parties submit the enclosed proposed Revised Scheduling Order.

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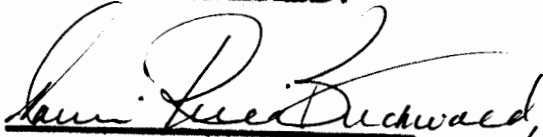
*Attorneys for Plaintiff-Counterclaim Defendant
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*Attorneys for Defendant-Counterclaim Plaintiff
 Wells Enterprises, Inc.*

SO ORDERED:


 U.S.D.J.

7/20/15